

BRYAN SCHRODER
United States Attorney

JONAS M. WALKER
Assistant U.S. Attorney
Federal Building & U.S. Courthouse
222 West 7th Ave., #9, Rm. 253
Anchorage, AK 99513-7567
Phone: 907-271-3983
Email: jonas.walker@usdoj.gov

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No.
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY TO COMMIT
v.)	CONTROLLED SUBSTANCE FRAUD
)	Vio. of 21 U.S.C. §§ 843(a)(3) and 846
MICHAEL DON ROBERTSON,)	
)	<u>COUNT TWO:</u>
Defendant.)	HEALTH CARE FRAUD
)	Vio. of 18 U.S.C. § 1347
)	

I N F O R M A T I O N

The United States Attorney charges that:

COUNT 1

On or about March 1, 2016, and continuing until at least on or about March 19, 2018, within the District of Alaska, the defendant, MICHAEL DON ROBERTSON, did knowingly and intentionally combine, conspire, confederate, and agree with another person to unlawfully distribute and to possess with intent to distribute controlled substances.

All of which is in violation of Title 21, United States Code, Sections 843(a)(3) and 846.

COUNT 2

On or between the dates of March 1, 2016 to March 19, 2018, within the District of Alaska, the defendant, MICHAEL DON ROBERTSON, did knowingly and willfully execute and attempted to execute a scheme and artifice to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by and under the custody and control of Medicaid, a health care benefit program as defined in Title 18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services.

All of which is in violation of Title 18, United States Code, Section 1347.

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United States Attorney

s/ Jonas M. Walker
JONAS M. Walker
Assistant U.S. Attorney
United States of America